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Attorneys for Defendant
Tower C. Snow, Jr.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RONALD F. GREENSPAN,

Plaintiff,

v.

TOWER C. SNOW, JR.,

Defendant.

Case No. C 05-02816 SI

**STIPULATION AND [PROPOSED] ORDER TO
CONTINUE CASE MANAGEMENT
CONFERENCE PENDING DISMISSAL OF
CASE WITH PREJUDICE PURSUANT TO
SETTLEMENT AGREEMENT**

Date: May 12, 2006
Time: 2:30 p.m.
Place: Courtroom 10

Judge: The Honorable Susan Illston

1 Plaintiff Ronald F. Greenspan, Trustee for the bankruptcy estate of Brobeck,
2 Phleger & Harrison, LLP, and Defendant Tower C. Snow, Jr., by and through their respective
3 counsel of record, hereby stipulate to continue the Case Management Conference scheduled in
4 the above referenced case from May 12, 2006 at 2:30 p.m. to July 21, 2006 at 2:30 p.m. Good
5 cause exists for accepting this stipulation, which is based on the following facts:

6 **Whereas**, the parties to this Action have reached a settlement, which was subject to
7 Bankruptcy Court approval;

8 **Whereas**, the Bankruptcy Court entered an order approving the Settlement on
9 March 29, 2006, which order is now final and non-appealable;

10 **Whereas**, the final payment due under the Settlement Agreement must be made on
11 or before June 28, 2006;

12 **Whereas**, the Settlement Agreement requires that a dismissal with prejudice of this
13 Action be filed within ten business days after receipt of the final settlement payment;

14 **Whereas**, the parties anticipate that a request for dismissal with prejudice of this
15 Action will be filed no later than July 12, 2006; and

16 **Whereas**, no further proceedings are necessary in this case pending dismissal.

17 **Now, therefore**, based on the foregoing facts, the parties stipulate to entry of an
18 order as follows:

19 1. The Case Management Conference currently scheduled for May 12, 2006
20 at 2:30 p.m. is continued to July 21, 2006 at 2:30 p.m. in Courtroom 10 of the United States
21 District Court for the Northern District of California, San Francisco Division. A Case
22 Management Conference Statement shall be filed no later than July 14, 2006. In the event that
23 the request for dismissal with prejudice is filed prior to the date set for the filing of the Case
24 Management Conference Statement or the Case Management Conference, no further action will
25 be required by the parties even if the dismissal is not yet entered by the Court.
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1 Dated: May 2, 2006

Respectfully submitted,

2 COOLEY GODWARD LLP

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5 By: /s/ Jeffrey S. Karr
6 Jeffrey S. Karr

7 Attorneys for Defendant Tower C. Snow, Jr.

8 Dated: May 1, 2006

HENNIGAN, BENNETT & DORMAN LLP

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11 By: /s/ Bennett J. Murphy
12 Bennett J. Murphy

13 Attorney for Plaintiff Ronald F. Greenspan

14
15 **ORDER**

16 Pursuant to stipulation, it is so ordered.

17 Dated: May __, 2006

18 

19 The Honorable Susan Illston
20 United States District Judge

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X, Paragraph (B), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the other signatories.

Dated: May 2, 2006

/s/ Jeffrey S. Karr

Jeffrey S. Karr

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